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EXHIBIT #4 (GROUND FOUR: SUPPORTING FACTS)

- 1) PETITIONER TOLD HIS LAWYER THAT HE INTENDED TO CALL WILBERT TAYNES AS A WITNESS.
- 2) AFTER THIS MEETING, FEDERAL CRIMINAL AUTHORITIES GOT WORD OUT TO MARQUIS TAYNES, THAT WILBERT WOULD BE CRIMINALLY INVESTIGATED IF HE TESTIFIED IN FAVOR OF THE PETITIONER.
- 3) AFTER THIS ENCOUNTER WITH THE INVESTIGATING AUTHORITIES WILBERT TAYNES REVERSED HIS OFFER TO TESTIFY FOR THE PETITIONER AND HIS REASONS FOR THE CHANGING HIS OFFER.
- 4) WILBERT TAYNES HAD MATERIAL EXCULPATORY EVIDENCE TO WHICH HE COULD HAVE TESTIFIED, THAT WOULD BENEFIT THE PETITIONER.
- 5) OTHER WITNESSES AGAINST THE PETITIONER WERE BRIBED WITH PROMISES OF DISMISSAL OF CRIMINAL CHARGES PENDING, BEFORE ANOTHER COURT, IN VIOLATION OF LAWS AND RULES OF ETHICS FOR THE OFFICERS OF THE COURT.